

**Daniel Goldsmith Ruggiero, Esquire\***

\*Admitted to practice law in ME, MA, RI, CT, NY, NJ & PA (state courts)  
ME, MA, RI, CT, NDNY, WDNY, EDNY, SDNY, NJ, EDPA & MDPA (federal courts)

April 21, 2015

Chambers of Hon. Philip J. Maenza  
Sussex County Judicial Center  
43-47 High Street  
Newton, NJ 07860

**Re: Debra Pairo-Hill v. Global Client Solutions, LLC et al**  
**SSX-668-14**  
**OPPOSITION TO PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

Dear Judge Maenza:

Please accept this letter in lieu of a more formal response. I originally filed an opposition to this Motion and sent courtesy copies to Judge McGovern's chambers. However, I have enclosed an additional copy for you as well.

This letter is in follow-up to my discussion with Gina from the Clerk's Office. She informed me that Default has NOT entered as to Credit Advocates Law Firm and Fast Track Debt Relief. As such, I overnighted for filing an Answer for both Defendants.<sup>1</sup> Therefore, Plaintiff's pending motion for Default Judgment should be mute.

Wherefore, Defendants Credit Advocates and Fast Track Debt relief respectfully request that Plaintiff's Motion for Default Judgment be denied and that default shall be vacated.

Respectfully submitted,



Daniel Goldsmith Ruggiero

cc:/ Counsel of Record

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<sup>1</sup> The Answer was filed on behalf of both these Defendants and Estopinan & Associates.

**\*\* Please send all correspondence to MA office**

**Massachusetts Office**  
P.O. Box 291  
Canton, MA 02021  
druggieroesq@hotmail.com  
339-237-0343 (phone)  
339-707-2808 (fax)

**New Jersey Office**  
331 Newman Springs Rd  
Bldg 1, 4th floor, Ste. 143  
Red Bank, NJ 07701

**New York Office**  
41 Madison Avenue  
25<sup>th</sup> Floor – Suite 2539  
New York, NY 10010